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January 27, 2021

Hon. Joan M. Azrack, U.S.D.J.

United States District Court

Eastern District of New York

Long Island Courthouse

100 Federal Plaza, Courtroom 920

Central Islip, New York 11722

Re: *Jacob Adoni, et al. v. World Business Lenders, LLC, et al.*
Civ. Act. No.: 2:19-cv-06971(JMA)

Dear Honorable Judge Azrack:

As the Court is aware, I represent plaintiffs Jacob Adoni and Harbor Park Realty, LLC in the above referenced matter and I write in response to the defendants' Letter Requests of January 15, 2021 (ECF 31) and January 25, 2021 (ECF 32) seeking leave to file a motion to dismiss. For the reasons set forth below, it is requested that defendant's request be denied without prejudice, and that the undersigned be given leave to file a motion to be relieved as counsel for plaintiffs. As part of this motion, the undersigned would request that plaintiffs be given the opportunity to conduct the discovery provided for in the Court's Order of October 20, 2020 (ECF 30).

The Court is familiar with the undersigned's family related matter which had previously resulted in plaintiffs' requests for extensions of time to file an Amended Complaint. The Amended Complaint was filed on August 31, 2020 (ECF 25) and a pre-motion conference was held on October 20, 2020, at which time the Court ordered that the parties shall engage in the exchange of limited targeted discovery by January 1, 2021 and submit a joint proposed motion scheduled by January 15, 2021. As stated in Mr. Malyshev's letter of January 15, 2020, the undersigned stopped communicating altogether in late 2020 - - again, this was due to a family related matter which was previously briefed to the Court. For these very same reasons, the undersigned was unable to complete the limited discovery by January 1, 2021.

For the reasons previously provided to the Court, and in the interests of avoiding any additional delay in this matter, the undersigned requests leave to file a motion to be relieved as counsel and allow for additional time for plaintiff to conduct the limited targeted discovery ordered by the Court, prior to the filing of cross-motions for Summary Judgment.

I thank the Court for its courtesy and consideration in this matter.

Respectfully submitted,

/s Marcus Aurelius Nussbaum
Marcus A. Nussbaum (MN 9581)

cc: **Via ECF**
All Counsel of Record